

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK**

WILMINGTON TRUST, N.A., as Securities
Intermediary,

Plaintiff,

v.

HERMAN SEGAL,

Defendant.

Civil Action No. 1:21-cv-01540-PKC-TAM

**DECLARATION OF KATHERINE A. SKEELE
ENCLOSING EXHIBITS TO MOTION FOR DEFAULT JUDGMENT**

I, Katherine A. Skeele, hereby declare as follows:

1. My name is Katherine A. Skeele, and I am associated with the New York office of Holland & Knight LLP. I submit this Declaration enclosing Exhibits in support of Wilmington Trust, N.A.’s, as Securities Intermediary (“Security Intermediary[’s]”) Motion for Default Judgment.

2. **Exhibit 1** attached hereto is a copy of John Hancock Life Insurance Policy No. 93973600.

3. **Exhibit 2** attached hereto is a copy of John Hancock Life Insurance Policy No. 93972826.

4. **Exhibit 3** attached hereto is a copy of the March 23, 2012 Letter Agreement by which the beneficiaries of the Segal Family Trusts, the Trustee, and Rhodium Special Opportunity Fund consented and agreed to the sale of the Policies (defined in the Memorandum of Law filed herewith).

5. **Exhibit 4** attached hereto is a copy of the March 26, 2012 Acknowledgment and Consent of Issue executed by Herman Segal in acknowledgement of and consent to the sale and assignment of the beneficial interest in the Policies.

6. **Exhibit 5** attached hereto is a copy of the August 04, 2016 Assignment and Assumption Agreement by which Life Equity assigned its interest in John Hancock Life Insurance Policy No.

93973600 to Geronta Funding.

7. **Exhibit 6** attached hereto is a copy of the Death Certificate, issued by the City of New York - Department of Health and Mental Hygiene, certifying the death of Sprinta Berger (a/k/a Lily Segal).

8. **Exhibit 7** attached hereto is a copy of the Declaration of James Donofrio (Director of Jewish Funeral Services of Brooklyn), executed under penalty of perjury on February 23, 2022.

9. **Exhibit 8** attached hereto is a copy of the Declaration of Dr. Eli Inzlicht-Sprei, M.D, executed under penalty of perjury on February 16, 2022.

10. **Exhibit 9** attached hereto is a copy of documents submitted by Lily Segal regarding her physician when she first took out the life insurance policies.

11. **Exhibit 10** attached hereto is copies of records obtained from the Clerk of the Superior Court of New Jersey, Law Division, evidencing the legal name change of Lilly Segal to Sprinta Berger.

12. **Exhibit 11** attached hereto is a copy of Lily Segal's Naturalization Certificate, issued by the United States District Court for the Eastern District of New York.

13. **Exhibit 12** attached hereto is a copy of the Order of Superior Court of New Jersey granting the Legal Name Change of Lilly Segal to Sprinta Berger

14. **Exhibit 13** attached hereto is a copy of the Acquaviva Report, which is an excerpt of public record search report identifying the individual to whom the Social Security Number ending in the digits -5373 is issued.

15. **Exhibit 14** attached hereto is a copy of the Social Security card issued by the United States Social Security Administration to Lilly Segal.

16. **Exhibit 15** attached hereto is a copy of the Driver's License issued to Herman Segal by the Commissioner of Motor Vehicles of New York State.

17. **Exhibit 16** attached hereto is a copy of the public record maintained in the NY ACRIS system evidencing the transfer of the parcel of real property located at 4115 Quentin Road, Brooklyn NY 11234, from Yocheved Segal to Quentin Manor LLC.

18. **Exhibit 17** attached hereto is Declaration of Richard J. Damm Jr. (Vice President of Beth David Cemetery), executed under penalty of perjury on February 23, 2022.

19. **Exhibit 18** attached hereto is a copy of the letter dated September 27, 2019 by which Life Equity, as servicing agent and representative, submitted a death benefit claim on the Policies to John Hancock.

20. **Exhibit 19** attached hereto are copies of communications between Holland & Knight and John Hancock.

21. All papers in support of Plaintiff's motion for default judgment will be simultaneously mailed to Defendant.

22. All papers regarding clerk's default were mailed to Defendant on February 25, 2022.

23. I declare under penalty of perjury that the foregoing is true and correct.

Executed on the 1st day of March, 2022 at Kings County, New York.

/s/ Katherine A. Skeele
Katherine A. Skeele